Exhibit B

RESPONSES TO CEASE AND DESIST LETTERS

Gmail

N. Wahid Azal <wahidazal66@gmail.com>

Re: Third Cease & Desist Notice – Unauthorized Use of Copyrighted Image, False Statements, and Continuing Harassment

1 message

Daniel Deitrick <daniel.deitrick@me.com> Thu, Jan 29, 2026 at 1:27 AM
To: "Azal N.W." <wahidazal66@gmail.com>

Either sue me in a court of law then, or shut the fuck up.

Sent from my iPhone

> On Jan 28, 2026, at 3:43 AM, N.W. Azal <wahidazal66@gmail.com> wrote:
>
> WITHOUT PREJUDICE – NOTICE TO CEASE AND DESIST
>
> **To:**
> Daniel Deitrick (a/k/a "DC Shepard")
> 1501 Harry Thomas Way NE, Apartment 604
> Washington, DC 20002
> United States
> Telephone: (914) 330-3976
> Email: daniel.deitrick@me.com
>
> officialdcshepard@gmail.com
>
> **From:**
> Wahid Azal
> Ashgrove, Queensland
> Australia
>
> **Date:** 28 January 2026
>
> Dear Mr. Deitrick,
>
> This letter constitutes a **third formal notice** requiring you to **cease and desist** from specified unlawful conduct. It is written without prejudice to any rights or remedies available to me at law or in equity.
>
> **1. Background and YouTube Counter-Notification**
>
> On 28 January 2026, YouTube notified me that you submitted a **DMCA counter-notification** relating to the removal of a video located at:
> http://www.youtube.com/watch?v=Agxbucr0ADE
>
> In that counter-notification, you asserted, *under penalty of perjury*, among other things, that:
>
> "I designed the thumbnail entirely from a publicly available image online for the purposes of criticism or commentary, which is fair use under the Copyright Act of 1976 as amended under DMCA 1998."
>
> You further alleged that my copyright complaint constituted an attempt "to suppress [your] free speech," and you made multiple accusations concerning my character and conduct.
>
> These statements are now part of a formal legal record generated by you voluntarily and sworn under penalty of perjury.
>
> **2. Copyright Infringement – Unauthorized Use of Photograph**
>
> The photographic image used by you as a thumbnail is an original photograph authored by me. Copyright protection attaches automatically upon creation under **17 U.S.C. §102(a)**. I am the sole copyright owner.
>
> Your use of the image as a **thumbnail / visual identifier** is not protected by fair use. Courts have consistently held that use of a photograph merely to depict or identify a person—rather than to

comment on the photograph itself—is **non-transformative** and weighs against fair use. See, inter alia:

- *BWP Media USA v. Gossip Cop Media*, 87 F. Supp. 3d 499 (S.D.N.Y. 2015)
- *Barcroft Media, Ltd. v. Coed Media Group*, 297 F. Supp. 3d 339 (S.D.N.Y. 2017)
- *Monge v. Maya Magazines*, 688 F.3d 1164 (9th Cir. 2012)

Your assertion that the image was "publicly available" is legally irrelevant; public availability does not negate copyright ownership.

3. False and Defamatory Statements

Your counter-notification further contains statements accusing me of criminal conduct, harassment, and threats of violence, including assertions that I engaged in "doxxing," "criminal action," and violent threats. These statements are **false**, unsupported, and published in a context intended to harm my reputation.

Under U.S. law, knowingly or recklessly publishing false statements of fact that harm another's reputation may constitute **defamation *per se***, **false light**, and **intentional interference with lawful rights**, depending on jurisdiction.

Nothing in the First Amendment protects false statements of fact or misuse of copyrighted material.

4. Demand

Accordingly, I hereby demand that you:

1. **Immediately cease and desist** from any further use, reproduction, or display of my copyrighted photograph in thumbnails, videos, or promotional materials;
2. **Refrain from publishing or republishing false statements of fact** alleging criminal conduct, threats of violence, or harassment by me;
3. **Cease further targeted use of my identity or image** in a manner intended to harass, intimidate, or misrepresent.

5. Reservation of Rights

Nothing in this letter constitutes a waiver of any rights or remedies. I expressly reserve all rights, including the right to pursue civil remedies in appropriate jurisdictions should the conduct described above continue.

This letter is sent in good faith in an effort to resolve this matter without further escalation.

Sincerely,

Wahid Azal

Gmail

N. Wahid Azal <wahidazal66@gmail.com>

Re: Dispute of Copyright Strike – The Hidden Faith Episode 3

1 message

DC Shepard <officialdcshepard@gmail.com> Wed, Dec 31, 2025 at 4:14 AM
To: "N.W. Azal" <wahidazal66@gmail.com>

You're going down for this.

On Tue, Dec 30, 2025 at 1:11 PM N.W. Azal <wahidazal66@gmail.com> wrote:

> DC,
>
> I categorically deny your allegations.
>
> No threats have been made, no restricted or unlawfully obtained information has been published, and no conduct constituting stalking, intimidation, or invasion of privacy has occurred. Your email misstates multiple statutes and asserts claims that are unsupported by fact or law.
>
> I will retain your message for the record. Any further communications of a hostile or defamatory nature will likewise be preserved.
>
> If you believe you have a viable legal claim, you are free to pursue it through appropriate legal channels.
>
> Do not contact me again except through counsel or formal service.
>
> Wahid Azal
>
> On Wed, Dec 31, 2025 at 4:07 AM DC Shepard <officialdcshepard@gmail.com> wrote:
>
> > Wow, doxxing me is a new low even for you. This violates 18 U.S.C. § 2261A. This law makes it a crime to use any interactive computer service to engage in a course of conduct that causes substantial emotional distress to a person or places them in reasonable fear of death or serious bodily injury. This is satisfied for me because if my real name is exposed to the general public, I have reasonable fear
> >
> > Another federal law is 18 U.S.C. § 875, which prohibits transmitting various types of threats in interstate commerce.
> >
> > A more specific statute, 18 U.S.C. § 119, protects certain individuals performing official duties. This law makes it illegal to knowingly publish restricted personal information of federal employees, jurors, or witnesses with the intent to threaten, intimidate, or incite violence against them. While this provides protection for a specific class of people, it does not apply to the general public. I however AM a federal employee of the United States!
> >
> > Another relevant civil claim is "Invasion of Privacy," specifically through the "public disclosure of private facts." This tort applies when someone publicizes a private matter **that is not of legitimate public concern** (such as my journalistic reporting on your threatening behavior towards third parties) and would be highly offensive to a reasonable person. For this claim to succeed, the information disclosed must have been genuinely private before it was shared. Suing under these torts allows victims to seek financial compensation for damage to their reputation, emotional well-being, and financial losses.
> >
> > Therefore I have reported your post to Substack, and am in the process of reporting you to YouTube for illegally using private information obtained during the copyright claim process I RETRACTED to responding to your malicious blocking of my video in Australia so that everyone can finally learn the truth about you and you can be kicked off the Internet. Otherwise, I will be servicing you legal process in the Federal District for the District Court of Columbia for intentional infliction of emotional distress, trademark infringement, invasion of privacy and more besides. If you will not do this, do not contact me again.
> >
> > Sincerely Fuck Off,
> >
> > DC Shepard
> >
> > Sent from my iPad
> >
> > > On Dec 29, 2025, at 1:01 AM, DC Shepard <officialdcshepard@gmail.com> wrote:

Meaning, to be clear, that you would be able to reupload the video cleaned of any association with my face and trademarks, though again the audio helps the video work at all so would need to be kept for sure.

Sent from my iPhone

> On Dec 29, 2025, at 12:56 AM, DC Shepard <officialdcshepard@gmail.com> wrote:
>
> Azal,
>
> Actually, I do have one final, formal request to ask of you. The Hidden Faith, The Hidden Faith: A TRULY Independent Investigation of the Baha'i Faith and the thumbnail and logo used during the interview is entirely my trademark and intellectual property, and even my half-masked face contains my image rights, so if you could kindly take down your copy of the video and then crop it (while keeping the original audio naturally) to the area around your face as well as change the title to something "Podcast Critical of Justin Baldoni" to not infringe on my trademark I would appreciate it.
>
> If technical assistance for that is needed I can provide that myself. My authorization for use that was intended to be revocable by me at any time and that you have rules-lawyered for your own gain, did not extend to being to able to display my podcast name or trademark at will and confuse anyone by association. If you reject this, then I will not pursue the matter further and a final reply to your reply will be my last communication with you.
>
> Sincerely,
>
> DC Shepard
>
> Sent from my iPhone
>
> > On Dec 26, 2025, at 6:52 PM, DC Shepard <officialdcshepard@gmail.com> wrote:
> >
> > Simply making a podcast critical of you is not considered defamatory by me. Do not come after me in response more than simply writing a blog about it and that will be the end of the matter.
> >
> > Goodbye Forever,
> >
> > DC Shepard
> >
> > Sent from my iPhone
> >
> > > On Dec 26, 2025, at 6:25 PM, N.W. Azal <wahidazal66@gmail.com> wrote:
> > >
> > > DC,
> > >
> > > I acknowledge receipt of your message and note your confirmation that you have retracted the copyright claim submitted to YouTube. I appreciate that clarification.
> > >
> > > For the avoidance of doubt, I categorically reject the various allegations and characterisations you include in your email. I will not engage in personal disputes, speculative claims, or commentary on future content you may choose to publish. Nothing in my counter-notification or subsequent correspondence was made in bad faith, nor did it involve any misuse of reporting or platform processes.
> > >
> > > Your retraction resolves the copyright issue. Beyond that, I consider this matter closed.
> > >
> > > Please do not contact me again except where strictly required for formal or legal reasons. I reserve all rights in respect of any defamatory statements, misrepresentations, or further escalations, whether online or otherwise.
> > >
> > > I wish you well and will not be engaging further.
> > >
> > > Regards,
> > > Wahid Azal
> > >
> > > On Sat, Dec 27, 2025 at 6:14 AM DC Shepard <officialdcshepard@gmail.com> wrote:
> > > > Azal,
> > > >
> > > > After seeing your official counter-notification, I have emailed YouTube to retract my copyright claim.
> > > >
> > > > <image0.jpeg>

I only didn't act on this earlier due to the Christmas season, and had assumed you were acting in bad faith when my November 29th demand to remove the video because I was disgusted with your vicious personal attacks on me and others (after months of trying to accommodate you and move on, even after your death threat could've destroyed my entire reputation) was ignored.

Otherwise it should expire in ten days, with my apologies as it was a genuine misunderstanding of podcast guest releases, not a bad faith attempt to abuse the copyright system. If I had known how loathsomely you would act towards Bahais and former collaborators alike, however, I would have protected my content (as really I did 99% of the research and all of the editing, thumbnailing, promotion etc.) with a much clearer agreement than I did. Lesson learned, especially if someone calls ME out for working with YOU (which is far more likely, as I'm not literally claiming to be God and issuing death threats to Baha'is and channel removal threats to me and others like you did to Dale.)

Here's the thing though: your response's analysis of my essay is wrong, and my final counter-essay (after which you can reply with whatever diatribe totalizing me as just another Western white boogeyman in repeated ignorance of my pronouns you like, and then I'll move on) and podcast with Dale Husband and Chris Bennett is going forward whether you like it or not.

And while I will apologize for the copyright strike on air, I have plenty of other evidence of your malfeasance through the years towards me and others, and would consider any attempts to abuse reporting systems as a legally serve-able escalation. You are a public figure, the laws of the United States and the District of Columbia would govern if you tried anything further, and under US law any defamation claim would need to prove actual malice which is not what motivated me to simply ask for more information on the one source you did provide, and then criticize you when you responded with venom. False attempts to remove my channel for First Amendment protected speech when I have not been racist to you or anything once would likely result in the termination of your channel. Again I remind you of this image.

<image0.jpeg>

My offer is simple, since I have put thousands of hours of blood, sweat and tears into History Flights Productions, and will soon be more focused on fighting American fascism and explaining the history of the Byzantine Empire anyway: leave me alone to say my final peace on you and this dispute we had, and I will leave you alone after this episode, if you do not harass me any further.

Sincerely,

DC Shepard

Sent from my iPad

> On Dec 24, 2025, at 8:49 AM, N.W. Azal <wahidazal66@gmail.com> wrote:
>
> Dear DC Shepard,
>
> I am writing regarding the copyright strike you have recently placed on my account in relation to *The Hidden Faith – Episode 3*.
>
> I appear in this video, and my participation **was not unconditional**, as was clearly expressed to you at the time. At the time of recording and release, I was expressly granted permission to republish the material myself, and I relied on that permission in good faith. On that basis, I shared the content with the understanding that my use was authorized and non-exclusive.
>
> Additionally, on the 10th of March 2025, you stated yourself in private message on Reddit, for the record:
>
> Mar 10 [2025] OfficialDCShepard 3:29 PM
>
> That works well for me! Thank you for letting me know, and I'll always consider you a friend and hope to visit you in Australia someday. I'll be sure to let Rami know what's up and ask when Mr. Douglas would be open to meeting with the two of us to brainstorm ideas. I'll also give you a production credit with the ideas for the future

episodes Gangs of Abha and The Fourth Religion of Palestine that I listed as we did brainstorm together on these subjects and that's only fair. Plus, the offer to discuss Byzantine and Islamic history together at some point when you're a bit more free stands, since I had an amazing time working with you when I did and you're a very knowledgeable person about Islamic history that has really opened my eyes.

Please know that despite my initial reactions there are no hard feelings from me.

Would you care to explain more about Mr. Douglas's background?

Also perhaps this is obvious but you can keep your copy of the video up. Even if someone calls me out down the road for working with you.

The screenshot is attached.

The subsequent issuance of a copyright strike after permission had been granted represents a reversal of position that I believe is inconsistent with the original understanding under which my participation and republication occurred. As you are aware, copyright enforcement mechanisms are **not intended to be used** where consent has already been given and relied upon, which you clearly have in writting.

I am therefore requesting that you withdraw the copyright strike and confirm that permission for my use of the material remains in effect, or alternatively, clarify the basis on which you now contend that my use was unauthorized despite the prior permission granted.

I hope this matter can be resolved promptly and amicably, without the need for further escalation through YouTube's formal dispute or counter-notification process.

I look forward to your response.

Sincerely,
Wahid Azal

<permission2.jpg>